UNITED STATES DISTRICT COURT	
FOR THE EASTERN DISTRICT OF NEW YORK	<

KBM WORLDWIDE, INC.

Civil Action No.: 2:16-cv-05295

Plaintiff,

(SJF) (ARL)

-against-

VAPOR GROUP, INC. AND DROR SVORAI,

Defendants.

REPLY AND ANSWER TO COUNTERCLAIMS

Plaintiff, KBM WORLDWIDE, INC. ("KBM"), files this Reply and Answer to Counterclaims and shows and alleges the following:

1. Denies the allegation and the demand for attorney's fees in the Defendants' Answer and avers that there is no contract, statute or other rule that would permit the recovery of attorneys' fees by the defendants from the plaintiff.

WHEREFORE, plaintiff demands judgment dismissing the demand for attorneys fees in its entirety awarding plaintiff the relief sought in the complaint and granting the plaintiff such other and further relief as to the Court may seem just and proper.

Dated: Great Neck, New York November 15, 2016

Yours, etc.

NAIDICH WURMANLLP

By:

Richard S. Maidich, Esq. (RSN 4102)

111 Great Neck Road, Suite 214

Great Neck, NY 11021

Telephone:516-498-2900 Facsimile: 516-466-3555

Attorneys for Plaintiff –

KBM WORLDWIDE, INC.

NEUSTEIN LAW GROUP, PA. Attorney for Defendants TO:

18305 Biscayne Boulevard – Suite 250 Aventura, FL 33160

Telephone: (305) 531-2545 Facsimile: (305) 531-2365